

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

NAN LIU, HAO LIU, AND GUANGXIANG XU DIRECTLY AND DERIVATIVELY ON BEHALF OF EB-5 SF INVESTMENT LIMITED PARTNERSHIP DIRECTLY AND DERIVATIVELY ON BEHALF OF SF HOTEL INVESTORS, LLC,

C.A. No. 1:24-cv-00564 CFC

JURY TRIAL DEMANDED

Plaintiffs,

V.

EB5 GLOBAL SF, LLC, SF HOTEL
INVESTORS, LLC, MIMA REAL ESTATE
PARTNERS I, LLC, RENOIR HM, LLC,
PROPER HOSPITALITY LLC, KOR
REALTY GROUP L.L.C., BRAD KORZEN,
KELLY WEARSTLER, ALEX SAMEK,
BRIAN DELOWE, AND DOES 1-500,

Defendants.

**STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME TO
RESPOND TO COMPLAINT**

WHEREAS on May 8, 2024, Plaintiffs filed a Verified Complaint and Class Action Complaint (the “Complaint” – D.I. 1) for Damages.

WHEREAS on May 10, 2024 Defendants MiMa Real Estate Partners I, LLC; Renoir HM, LLC; and Proper Hospitality LLC were served with the Complaint.

WHEREAS on May 23, 2024 Defendant Kor Realty Group L.L.C. was served with the Complaint.

WHEREAS on May 31, 2024 the Court ordered a stipulation extending the deadline for Defendants MiMa Real Estate Partners I, LLC; Renoir HM, LLC; and Proper Hospitality LLC to move, answer, or otherwise respond to the Complaint to July 1, 2024.

WHEREAS on June 13, 2024 the Court ordered a stipulation extending the deadline for Defendant Kor Realty Group L.L.C. to move, answer, or otherwise respond to the Complaint to July 1, 2024.

WHEREAS on June 25, 2024, Defendants Brad Korzen, Kelly Wearstler, Alex Samek, and Brian De Lowe agreed to waiver of service under Rule 4.

WHEREAS on July 1, 2024, the Court ordered a stipulation extending the deadline for Defendants MiMa Real Estate Partners I, LLC; Renoir HM, LLC; Proper Hospitality LLC; Kor Realty Group L.L.C.; Brad Korzen; Kelly Wearstler; Alex Samek; and Brian De Lowe to move, answer, or otherwise respond to the Complaint to August 26, 2024.

WHEREAS on August 2, 2024 SF Hotel Investors, LLC was served with the Complaint.

WHEREAS on August 5, 2024 EB5 Global SF, LLC was served with the Complaint.

WHEREAS on August 21, 2024, the Court ordered a stipulation extending the deadline for Defendant EB5 Global SF, LLC to move, answer, or otherwise respond to the Complaint to September 26, 2024.

IT IS HEREBY STIPULATED AND AGREED, by and between the parties hereto, and subject to the approval of the Court, that the time for Defendants MiMa Real Estate Partners I, LLC; Renoir HM, LLC; Proper Hospitality LLC; Kor Realty Group L.L.C.; SF Hotel Investors, LLC; Brad Korzen; Kelly Wearstler; Alex Samek; and Brian De Lowe to move, answer, or otherwise respond to the Complaint is extended to September 26, 2024.

<p>STAMOULIS & WEINBLATT, LLC</p> <p><u>/s/ Stamatios Stamoulis</u> Stamatios Stamoulis (#4606) Richard C. Weinblatt (#5080) 800 N. West Street Third Floor Wilmington, DE 19801 302.999.1540</p> <p><i>Counsel for Plaintiffs Nan Liu, Hao Liu, and Guangxiang XU Directly and derivatively on behalf of EB-5 SF Investment Limited Partnership directly and derivatively on behalf of SF Hotel Investors, LLC</i></p>	<p>KENNEDYS CMK LLP</p> <p><u>/s/ Marc S. Casarino</u> Marc S. Casarino, Esquire (#3613) Katie Barksdale (#6101) 222 Delaware Avenue, Suite 710 Wilmington, DE 19801 302.308.6647</p> <p><i>Counsel for Defendants MiMa Real Estate Partners I, LLC; Renoir HM, LLC; Proper Hospitality LLC; Kor Realty Group L.L.C.; SF Hotel Investors, LLC; Brad Korzen; Kelly Wearstler; Alex Samek; and Brian De Lowe</i></p>
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IT IS SO ORDERED this _____ day of _____, 2024.

The Honorable Colm F. Connolly